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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN MAYORGA,
Plaintiff,

Case No. 2:19-cv-00168-JAD-DJA

vs.

**STIPULATION AND ORDER
REGARDING DEPOSITIONS**

CRISTIANO RONALDO,
Defendant.

Plaintiff, Kathryn Mayorga, by and through her attorneys, Stovall & Associates, Defendant, Cristiano Ronaldo, by and through his attorneys, Christiansen Trial Lawyers, (collectively referred to as the "PARTIES") and deponents Joseph Bongiovi, Kathy Bongiovi and Bongiovi Dispute Resolutions (collectively referred to as "BONGIOVI") by and through their attorneys, Pyatt Silvestri, enter into the following stipulation and order:

WHEREAS the PARTIES participated in a mediation, with BONGIOVI acting as the Mediator (the "Mediation"), on January 12, 2010, and

WHEREAS the PARTIES wish to take depositions of Joe Bongiovi, Kathy Bongiovi and Bongiovi Dispute Resolutions, and

WHEREAS NRS 48.109 states that proceedings of a mediation are to be regarded as settlement negotiations and that no admission, representation or statement made during the



1 session, not otherwise discoverable or obtainable, is admissible as evidence or subject to
2 discovery, and that a mediator is not subject to civil process, and

3 WHEREAS the PARTIES and BONGIOVI are willing to waive any privilege or
4 confidentiality, as might be contemplated by NRS 48.109, related to the Mediation,

5 It is hereby agreed and stipulated to:

6 1. The PARTIES waive any confidentiality concerning the mediation.

7 2. The PARTIES will provide BONGIOVI's counsel, James P.C. Silvestri, with
8 copies of any documents that are intended to be used at the depositions at least one week prior to
9 the depositions.

10 3. If any documents provided by the PARTIES are subject to any protective or
11 confidentiality Order, BONGIOVI and his counsel agree to abide by such Order just as the
12 PARTIES are required to do.

13 4. At least one week prior to the depositions, BONGIOVI will provide to the
14 PARTIES any documents still within BONGIOVI's possession related to the Mediation.

15 5. BONGIOVI waives any right to claim privilege or confidentiality related to NRS
16 48.109.

17 6. The PARTIES expressly release BONGIOVI from any and all claims related to or
18 arising in any way from the Mediation and grant BONGIOVI immunity from all claims, lawsuits,
19 actions, legal or otherwise, related to or arising from the Mediation or from any involvement that
20 BONGIOVI had related to any dispute between the Parties, more fully described by the pleadings
21 filed herein.
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7. The depositions will be conducted via Zoom or similar format. The depositions will be scheduled as follows: Kathy Bongiovi on May 11, 2021 at 3:00 p.m. (PDT); and Joseph Bongiovi on May 12, 2021 at 9:00 a.m. (PDT).

Respectfully Submitted this 29th day of April, 2021.

CHRISTIANSEN TRIAL LAWYERS

STOVALL & ASSOCIATES

/s/ Keely A. Perdue, Esq.

/s/ Leslie M. Stovall, Esq.

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/s/ James P.C. Silvestri, Esq.

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Las Vegas, NV 89101

Attorneys for Deponents,

Joseph Bongiovi, Kathy Bongiovi,

and Bongiovi Dispute Resolutions

ORDER

IT IS SO ORDERED.

DATED this _____ day of April, 2021.

U. S. MAGISTRATE JUDGE



From: Les Stovall <les@lesstovall.com>

Date: Thursday, April 29, 2021 at 12:56 PM

To: "Peter S. Christiansen" <pete@christiansenlaw.com>, James Silvestri <jsilvestri@pyattsilvestri.com>, Kendelee Works <kworks@christiansenlaw.com>

Cc: Barbara Abbott <babbott@pyattsilvestri.com>, Maria Hernandez <maria@lesstovall.com>, Ross Moynihan <ross@lesstovall.com>, Melina Gonzales <melina@lesstovall.com>

Subject: RE: Bongiovi deposition

Yes- you have my consent to e-sign on my behalf the stip and order prepared by jim Silvestri regarding the depositions of the Bongiovis- lms

From: Peter S. Christiansen <pete@christiansenlaw.com>

Sent: Thursday, April 29, 2021 10:47 AM

To: Les Stovall <les@lesstovall.com>; James Silvestri <jsilvestri@pyattsilvestri.com>; Kendelee Works <kworks@christiansenlaw.com>

Cc: Barbara Abbott <babbott@pyattsilvestri.com>; Maria Hernandez <maria@lesstovall.com>; Moynihan Ross <ross@lesstovall.com>; Melina Gonzales <melina@lesstovall.com>

Subject: Re: Bongiovi deposition

Les-

As Jim points out in his email, he is unable to file the Stipulation. We are happy to do it but need your permission to affix your electronic signature. I assume since you fine with Jim doing it, you do not object to my office handling but want to be crystal clear. Please advise.

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From: Les Stovall <les@lesstovall.com>

Date: Thursday, April 29, 2021 at 10:34 AM

To: James Silvestri <jsilvestri@pyattsilvestri.com>, "Peter S. Christiansen" <pete@christiansenlaw.com>, Kendelee Works <kworks@christiansenlaw.com>

Cc: Barbara Abbott <babbott@pyattsilvestri.com>, Maria Hernandez <maria@lesstovall.com>, Moynihan Ross <ross@lesstovall.com>, Melina Gonzales <melina@lesstovall.com>
Subject: RE: Bongiovi deposition

Jim- you are authorized to esign stip on my behalf if that is acceptable – if not I will sign and email copy to you _ ty/lms

From: James Silvestri <jsilvestri@pyattsilvestri.com>
Sent: Thursday, April 29, 2021 10:25 AM
To: les@lesstovall.com; Peter S. Christiansen <pete@christiansenlaw.com>; Kendelee Works <kworks@christiansenlaw.com>
Cc: Barbara Abbott <babbott@pyattsilvestri.com>
Subject: Bongiovi deposition
Importance: High

All

I called the court and confirmed that one of the parties has to file the actual stipulation and order. I am attaching a finalized copy of your review.

Whoever decides to sign needs to probably insert a name block on the front page. I give permission for my signature to be electronically signed.

Please let me know once this gets done as we are fast approaching May 11, 2021. I need to confirm arrangements on our side as I imagine you also have to do.

Thanks.

Jim

James P.C. Silvestri

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